

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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XRAMP TECHNOLOGIES, INC. and  
XRAMP SECURITY SERVICES, INC.,

Plaintiff,

v.

GEOTRUST, INC. and  
CHRISTOPHER BAILEY,

Defendants.

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Civil Action No. 05-11374-RCL

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GEOTRUST, INC.,

Counterclaim Plaintiff,

v.

XRAMP TECHNOLOGIES, INC. and  
XRAMP SECURITY SERVICES, INC.

Counterclaim Defendants.

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**JOINT MOTION TO EXTEND PRE-TRIAL DEADLINES BY THREE MONTHS**

XRamp Technologies Inc., XRamp Security Services, Inc., GeoTrust, Inc., and Christopher Bailey (collectively, the “Parties”) hereby jointly move to extend the pre-trial deadlines in this case by three months.

The Parties seek this extension because a discovery dispute has impaired the Parties’ ability to complete discovery. That dispute is the subject of a motion to compel that was filed on March 17, 2006. See GeoTrust’s Motion to Compel the Production of Documents and Interrogatory Answers (Dkt. 8). The Court has scheduled a hearing on that motion for Thursday, May 18, 2006, at 3:00 p.m.

Discovery in this case is currently scheduled to end on May 31, 2006. Once the Court rules on the motion to compel, the Parties believe they can expeditiously complete discovery. Accordingly, the Parties seek to revise the pre-trial deadlines as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Fact Discovery Concluded	May 31, 2006	August 31, 2006
Experts Designated (i.e., reports due from both parties in support of the Complaint and Counterclaim)	June 30, 2006	October 2, 2006
Rebuttal Reports	July 31, 2006	November 3, 2006
Expert Discovery Completed	September 30, 2006	January 12, 2007
Rule 56 Motions Filed	November 1, 2006	February 16, 2007

The proposed extensions are approximately three months, with some additional time built in at the end due to the year-end holidays.

WHEREFORE, the Parties jointly request that this Court amend the scheduling order to reflect the new dates set forth above.

XRAMP TECHNOLOGIES, INC.  
and XRAMP SECURITY SERVICES, INC.

By their attorneys,

/s/ John W. Brister

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By their attorneys,

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Dated: May 15, 2006